

LATHAM & WATKINS LLP
Andrew M. Gass (Bar No. 259694)
andrew.gass@lw.com
Joseph R. Wetzel (Bar No. 238008)
joe.wetzel@lw.com
505 Montgomery Street, Suite 2000
San Francisco, California 94111-6538
Telephone: (415) 391-0600

Allison L. Stillman (*pro hac vice*)
alli.stillman@lw.com
1271 Avenue of the Americas
New York, NY 10020
Telephone: (212) 906-1200

*Attorneys for Defendants Internet Archive, Brewster
Kahle, Kahle/Austin Foundation, George Blood,
and George Blood L.P.*

(Additional counsel listed on signature pages)

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UMG RECORDINGS, INC, CAPITOL,
RECORDS, LLC, CONCORD BICYCLE
ASSETS, LLC, CMGI RECORDED MUSIC
ASSETS LLC, SONY MUSIC
ENTERTAINMENT, and ARISTA MUSIC

Plaintiff(s),

vs.

INTERNET ARCHIVE, BREWSTER,
KAHLE, KAHLE/AUSTIN FOUNDATION,
GEORGE BLOOD, and GEORGE BLOOD,
L.P.

Defendant(s).

Case No. 3:23-cv-06522-MMC

**STIPULATION AND [PROPOSED] ORDER
TO VACATE CASE DEADLINES**

Pursuant to Civil Local Rule 6-1(b) and Section 7 of the Court's Standing Orders, Defendants Internet Archive, Brewster Kahle, the Kahle/Austin Foundation, George Blood, and George Blood LP (collectively, "Defendants") and Plaintiffs UMG Recordings, Inc., Capitol Records, LLC, Concord Bicycle Assets, LLC, CMGI Recorded Music Assets LLC, Sony Music Entertainment, and Arista Music (collectively, "Plaintiffs") (Plaintiffs and Defendants shall collectively be referred to as the "Parties"), hereby stipulate as follows:

WHEREAS, the Court granted a stay of this matter through August 6, 2025, ECF No. 174, to allow the parties to continue to pursue settlement discussions;

WHEREAS, the Court ordered the Parties to propose a new schedule for the case and submit a joint proposed scheduling order following expiration of that stay;

WHEREAS, the Parties have engaged in and made significant progress in settlement discussions;

WHEREAS, the Parties believe that there is currently no need to submit a proposal for a further schedule for the litigation;

NOW, THEREFORE, the Parties hereby stipulate and respectfully request the Court to order as follows:

1. The deadline to file a joint proposed scheduling order shall be vacated while the Parties continue their settlement discussions.
2. The Parties shall file a joint status update regarding the progress of settlement discussions on or before August 29, 2025.

Dated: August 21, 2025

Respectfully submitted,

LATHAM & WATKINS LLP

/s/ Andrew M. Gass

Andrew M. Gass (Bar No. 259694)

andrew.gass@lw.com

Joseph R. Wetzel (Bar No. 238008)

joe.wetzel@lw.com

LATHAM & WATKINS LLP

505 Montgomery Street, Suite 2000

San Francisco, CA 94111

(415) 391-0600

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Allison L. Stillman (*pro hac vice*)
alli.stillman@lw.com
1271 Avenue of the Americas
New York, NY 10020
(212) 906-1200

Brent Murphy (*pro hac vice*)
brent.murphy@lw.com
555 Eleventh Street NW, Suite 1000
Washington, DC 20004
(202) 637-2201

*Attorneys for Defendants Internet Archive,
Brewster Kahle, Kahle/Austin Foundation,
George Blood, and George Blood L.P.*

OPPENHEIM + ZEBRAK LLP

/s/ Matthew J. Oppenheim
Matthew J. Oppenheim (*pro hac vice*)
matt@oandzlaw.com
Corey Miller (*pro hac vice*)
corey@oandzlaw.com
Danae Tinelli (*pro hac vice*)
danae@oandzlaw.com
4530 Wisconsin Avenue NW, 5th Floor
Washington, DC 20016
Telephone: (202) 480-2999

Noel M. Cook (Bar No. 122777)
ncook@hansonbridgett.com
HANSON BRIDGETT LLP
425 Market Street, 26th Floor
San Francisco, California 94105
Telephone: (415) 777-3200

Jacob L. Tracer (*pro hac vice*)
jtracer@riaa.com
RECORDING INDUSTRY ASSOCIATION
OF AMERICA
1000 F St. NW, 2nd Floor
Washington, DC 20004-1512
Telephone: (202) 857-9611

*Attorneys for Plaintiffs UMG Recordings, Inc.;
Capital Records, LLC; Concord Bicycle Assets,
LLC; CMGI Recorded Music Assets LLC; Sony
Music Entertainment; and Arista Music*

SIGNATURE ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from each of the signatories hereto.

Dated: August 21, 2025

/s/ Andrew M. Gass
Andrew M. Gass

PROPOSED ORDER

The Court, having considered the Parties' Stipulation to Vacate Case Deadlines, and good cause having been shown, hereby orders as follows:

1. The deadline to file a joint proposed scheduling order is vacated while the Parties continue their settlement discussions.
2. The Parties shall file a joint status report regarding the progress of settlement discussions on or before August 29, 2025.

IT IS SO ORDERED.

Dated: _____

MAXINE M. CHESNEY
United States District Judge